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FILED  
Clerk  
District Court

AUG 24 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Attorneys for Defendant Neo Fashion Inc.

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN MARIANA ISLANDS**

XIANG HUA LI,	)	Civil Action No. 05-0016
	)	
Plaintiff,	)	
	)	
v.	)	<b>NEO FASHION INC.'S</b>
	)	<b>INITIAL DISCLOSURES</b>
NEO FASHION INC., MS. CHEN, and	)	
JANE DOE,	)	
	)	
Defendants.	)	
_____	)	

Pursuant to Fed. R. Civ. P. 26(a)(1) and L.R. 16.2CJ.d., defendant Neo Fashion Inc.

("Neo Fashion") hereby makes its required initial disclosures:

**I. Individuals Likely to Have Discoverable Information**

Pursuant to Rule 26(a)(1)(A), Neo Fashion provides the following list of persons as individuals likely to have discoverable information that Neo Fashion may use to support its defenses.

1. Rah Byung Moon (address until September 9, 2005: Neo Fashion, P. O. Box 1718, San Antonio, Saipan, MP 96950; telephone number until September 9, 2005: 234-9642)
2. Che Kuk Youl
3. Yoo Sun Yong

4. Piao Chun Yu
5. Li Xue Jiao
6. Chen Fu Min
7. Hwang Shan Yue
8. Joanne Richards (no known address or telephone number)

We will provide the addresses and telephone numbers for the persons listed above at Numbers 2-7, or notify the Court and the plaintiff that we have no information about these persons' addresses or telephone numbers, once we complete our investigation.

## **II. Documents, Data Compilations, and Tangible Things**

Pursuant to Rule 26(a)(1)(B), Neo Fashion provides the following description by category and location of all documents, data compilations, and tangible things that are in the possession, custody, or control of Neo Fashion and that Neo Fashion may use to support its defenses. Unless otherwise stated, all documents, data compilations, and tangible things identified we expect to be located at counsel's office shortly.

1. Plaintiff's personnel file.
2. Personnel file of Li Xue Jiao.
3. Personnel file of Joanne Richards.
4. Company handbook.

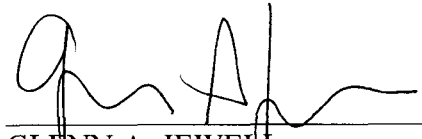
## **III. Computation of Damages**

Pursuant to Rule 26(a)(1)(C), Neo Fashion states that at this time, Neo Fashion is not seeking damages from plaintiff.

#### **IV. Insurance Agreements**

Pursuant to Rule 26(a)(1)(D), Neo Fashion identifies its workers' compensation insurance as an insurance agreement under which an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment. The relevant documents are being located and will be provided to plaintiff's counsel shortly.

DATED: August 24, 2005.

  
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GLENN A. JEWELL  
Attorney for Defendant Neo Fashion Inc.